<center><u>REMARKS</u></center>

<u>Brief Summary of Telephone Interview</u>

On July 19, 2006, applicants' attorney discussed the Office Action Response of June 21, 2006 and the Supplementary Response of July 17, 2006 with Examiner Wozniak during a telephone interview.

With respect to dependent Claims 14 and 15, applicants' attorney indicated that she will cancel Claim 15 and amend Claim 14 to recite "… machine readable instructions for carrying out the steps of Claim 1." Examiner Wozniak indicated that this would most likely be sufficient for him to withdraw his objections to Claims 14 and 15.

With respect to step (b) of independent Claim 1, applicants' attorney pointed out that an amendment has been made in a prior response to recite that each tag has a corresponding tag action associated with it. In response, Examiner Wozniak indicated that the clarification of a tag action as hovering over a recognized tag (as set forth in the Remarks section of the Office Action Response of June 21, 2006) may overcome the Allen reference. But, he noted that this definition does not appear in the claim. Applicants' attorney indicated that she would consider this amendment to the claim, but upon further consideration and review, has decided to present arguments that should patentably distinguish the claimed subject matter over the cited art based on other grounds.

With respect to step (d) of independent Claim 1, applicants' attorney pointed out that an amendment has been made in a prior response to recite that the document is based on at least one member of a group consisting of a template and a schema. Examiner Wozniak indicated that Allen may include a table that refers to keynotes and that the user can add to it and thus, the Examiner may decide during his upcoming examination of this application that this element in Allen is equivalent to a template. In addition, Examiner Wozniak also indicated that he may perceive Allen's table as a schema. The following remarks address the Examiner's point of view.

Applicants' attorney would like to again thank Examiner Wozniak for his time and willingness to discuss these issues during the telephone interview.

<u>Status of the Claims</u>

Claims 1-14, and 16-45 are pending in the application, Claim 15 having been canceled, and Claim 14 having been amended.

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Claim Objections

In the Office Action dated February 22, 2006, the Examiner objected to Claims 14 and 15 as being of improper dependent form for failing to further limit the subject matter of a previous claim. Applicants have canceled Claim 15 and amended Claim 14 to recite a memory medium for carrying out all of the steps of Claim 1. Accordingly, applicants respectfully request that the Examiner withdraw his objection.

Claims Rejected under 35 U.S.C. § 102(b)

The Examiner has rejected Claims 1-2, 5-7, and 13-15 as being anticipated by Allen et al. (U.S. Patent No. 6,026,410 hereinafter referred to as "Allen"). The Examiner asserts that Allen describes each element of applicants' claim recitation. Applicants respectfully disagree for the reasons noted below.

In the interest of reducing the complexity of the issues for the Examiner to consider in this response, the following discussion focuses on independent Claims 1, 16, 28, 39, and 44. The patentability of each dependent claim is not necessarily separately addressed in detail. However, applicants' decision not to discuss the differences between the cited art and each dependent claim should not be considered as an admission that applicants concur with the Examiner's conclusion that these dependent claims are not patentable over the cited references. Similarly, applicants' decision not to discuss differences between the prior art and every claim element, or every comment made by the Examiner, should not be considered as an admission that applicants concur with the Examiner's interpretation and assertions regarding those claims. Indeed, applicants believe that all of the dependent claims patentably distinguish over the references cited. However, a specific traverse of the rejection of each dependent claim is not required, since dependent claims are patentable for at least the same reasons as the independent claims from which the dependent claims ultimately depend.

Patentability of Independent Claim 1

Significant differences exist between the recitation in applicants' Claim 1 and the teachings of Allen because Allen does not teach or suggest *at least one linguistic component* that is identified by parsing a text entry and that is then compared to the plurality of tags and does not teach or suggest exhibiting at least one behavior in the document that is based on at least one of a template and a schema associated with both the tag and the document. It may be helpful to summarize an example from the specification that illustrates the steps of applicants' independent Claim 1. The disclosure summarizes an exemplary embodiment of the claimed subject matter as:

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As shown above in Table 3, the user has entered the description "Flew to Seattle." In response, the present invention causes the spreadsheet program to display the GL Description "Recruit-Travel." In addition, it enters the GL Code "722003" in an adjacent hidden cell of the Expense Report so that when the Expense Report is submitted, the expense can be properly allocated by the accounting department of the business (or by an automated accounting module). (Applicants' specification, page 12, lines 26-31.)

In the simple example discussed herein, the document is created in a spreadsheet Expense Report template, and the action that is implemented by the spreadsheet program in response to a text entry made by the user in a specific field of the spreadsheet, i.e., the expense description field, is to display and enter the GL Description (visible) and the GL Code (hidden) associated with the expense type that is determined by recognizing the text entered by the user. (Applicants' specification, page 13, line 28-page 14, line 1.)

In the above example, a user such as a company employee enters a description into an Expense Report. The present invention causes the spreadsheet program to display the GL Description and enter the GL Code such that the expense can be properly allocated by the accounting department. Thus, as recited in the preamble of independent Claim 1, the claimed subject matter is a method for initiating an action (e.g., displaying and entering of the GL Description and Code) in regard to a document (e.g., Expense Report) being accessed by a user in an application (e.g., spreadsheet program).

More specifically, applicants' step (a) recites:

parsing a text entry made by a user in the document to identify *at least one linguistic component* of the text entry;

For example, it is implied from the Expense Report of Table 3 that when a company employee makes an entry in the Expense Report of the spreadsheet program such as "Flew to Seattle," at least one linguistic component of the entry "Flew to Seattle" has been identified. In addition, the specification discloses that:

Each cell in which the user enters text is passed to client 100 through the Smart Tag interfaces noted above and identified, as explained below. If the text was entered in the description column of the Expense Report spreadsheet template (for the exemplary application of the present invention), *the client passes the contents entered in the cell to the NL Parser engine* that is provided in Microsoft Corporation's Office XP™ (for general spelling and grammar checking). *The NL Parser engine returns a normalized tree of the words entered by the user.* Client 100 then compares the normalized tree with words and synonyms that are included in the dictionary that was downloaded with the template/document from the server to identify the correct expense GL Code.

Once the GL Code is identified, an action handler is invoked and a GL Description and GL Code are entered into the proper spreadsheet cells in accord with the downloaded action corresponding to the Smart Tag returned in response to the text entered by the user in the expense description field. Although the template, dictionaries, and other necessary modules and functionality could be completely contained on client 100, they are preferably downloaded from the server to which client 100 is connected, preferably using Simple Object Access Protocol (SOAP) 110. This protocol, which is message-based, employs XML for accessing services on the Web. (Emphasis added, applicants' specification, page 14, line 19-page 15, line 3.)

In the italicized portion of the above quote, the specification discloses how the contents of the cell are passed to the NL Parser engine and that a normalized tree of the words entered by the user is returned. Thus, applicants illustrate an example of parsing (e.g., via the NL Parser engine) a text entry (e.g., Flew to Seattle) to identify at least one linguistic component of the text entry (i.e., the example illustrates that there is a normalized tree of the words, so at least one tree is created).

Applicants' step (b) recites:

providing a plurality of tags, each of the plurality of tags having a corresponding tag action associated with it;

For example, FIGURE 5 illustrates tag catalog 316 that includes tags 318 such as dinner and lunch and corresponding actions 320. The accompanying disclosure explains:

Referring back to FIGURE 7, step 508 provides that the tag recognizer load a user profile and a tag catalog from the backend or server. As shown in FIGURE 5, a profile store 314 is maintained on the server managed by Active directory and optionally, by SQL Server, so that a dictionary specific to a particular user or user role context may be loaded. Tag catalog 316 provides an appropriate dictionary associating instances with actions in the context of the type of document, user, or role of the user. The actions included within a dictionary may differ depending upon the context of the dictionary. In the Expense Report example, there is clearly a difference in the user role of an employee who is filling out the Expense Report and a manager who is reviewing the Expense Report for the purposes of approving the expenses entered by the employee. The context sensitivity in regard to user profile is evident in profile store 314, which identifies users 322 in connection with their roles 324. Web services 312 provides the tag catalog and user context information to the productivity application through the tag recognizer. (Emphasis added, applicants' specification, page 21, lines 3-15.)

As indicated by the underlined portion above, web services 312 provides the tag catalog to the productivity application and it is the tag catalog 316 that provides an appropriate dictionary

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associating instances with actions in the context of the document type, for example. Thus, applicants illustrate an example of providing a plurality of tags (e.g., tags 318), each of the plurality of tags having a corresponding tag action (e.g., actions 320) associated with it.

Applicants' step (c) recites:

comparing *said at least one linguistic component* to the plurality of tags to determine at least one tag that corresponds to each linguistic component;

FIGURE 5 is a functional block diagram showing the relationship between functional components employed on a client and a server in the present invention. The accompanying disclosure explains that in step 516, the tag recognizer 308 compares the normalized text provided by the parser with corresponding tags loaded from tag catalog 316, for the dictionary (applicants' specification, page 21, lines 28-29.) The disclosure also explains that client 100 compares the normalized tree with words and synonyms that are included in the dictionary, which was downloaded, with the template/document from the server to identify the correct expense GL Code (applicants' specification, page 14, lines 25-27). Thus, applicants illustrate how at least one linguistic component (i.e., at least one word or phrase from the normalized tree created in step (a)) is compared to the plurality of tags (e.g., tags 318) to determine at least one tag (e.g., tag related to the correct expense GL Code) that corresponds to each linguistic component.

Applicants' step (d) recites:

automatically carrying out the tag action associated with said at least one tag, wherein the tag action exhibits at least one behavior in the document that is based on at least one member of a group consisting of a template and a schema associated with both the tag and the document.

As highlighted in the bold font in the first citation above, once the GL Code is identified, an action handler is invoked, and a description and code are entered into the proper spreadsheet cells in accord with the downloaded action corresponding to the Smart Tag returned in response to the text entered by the user in the expense description field. Thus, applicants illustrate an example of automatically carrying out the tag action (e.g., entering the GL Code) that is associated with said at least one tag, wherein the tag action exhibits at least one behavior in the document (e.g., a hidden cell is filled in) in the document (e.g., the Expense Report) that is based on at least one member of a group consisting of a template (e.g., the Expense Report template) and a schema associated with both the tag and the document.

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In contrast, Allen does NOT teach or suggest any equivalent of applicants' recitation of "at least one linguistic component," because Allen's tokens are not the result of both being identified from parsing a text entry (step (a)) and then being used in a comparison to the plurality of tags (step (c)).

With respect to applicants' step (a), in the Office Action, page 3, the Examiner has asserted that Allen teaches a means for performing parsing on a natural language text to form tokens and in support of his assertion, he cites column 5, line 57-column 6, line 11, which is reproduced below:

> FIG. 2 illustrates in block diagram form the main components of the preferred embodiment of the present invention. A user provides natural language text expressions (i.e., keynotes) representing notes, thoughts, or action requests which are provided to user interface 200. User interface 200 passes these text expressions to parser 300. Parser 300 is responsible for identifying the type of keynote and for linking the keynote to one or more corresponding information objects based upon identified keywords or date/time expressions found in the input text expression. The linked objects include lists, projects, contacts, e-mail addresses, enclosed document identifiers, and date/time events for use in a calendar. *Parser 300 uses lexical analysis tool 400 to partition the input text expression into a plurality of tokens. Tokens are sequential or adjacent portions of the input text expression between pre-specified delimiters.* Once parser 300 has classified the keynote type and has linked the keynote to the associated objects, the linked list, project, contact, associated e-mail addresses enclosed document identifiers, and any calendar event, is passed back to user interface 200 and displayed by user interface 200 in a keynote and shadow region on display device 121. (Emphasis added, Allen, column 5, line 57-column 6, line 11.)

The Examiner appears to be asserting that Allen's tokens are equivalent to applicants' "linguistic component." With respect to applicants' step (c), the Examiner has asserted that Allen teaches comparing keywords in an input text to the keyword identifiers for link generation (finding related contact information, calendar events, projects, etc.) and in support of his assertion, he cites column 7, lines 1-32. *Id.* The Examiner also references Allen's matching operation and cites column 12, line 46-column 13, line 64. *Id.* Further, the Examiner appears to be asserting that Allen's keyword identifiers are equivalent to applicants' plurality of tags.

Applicants' "at least one linguistic component" is not only identified by parsing a text entry made by a user in the document as recited in step (a) but also is compared to the plurality of tags as recited in step (c). Yet, the Examiner has asserted that Allens' tokens perform step (a) and that Allen's keywords perform step (c). Allen's tokens and Allen's keywords are NOT the same because Allen discloses that keywords are formulated from tokens (Allen, column 12, lines 15-16). Notice in

the italicized portion of the above citation, that when a user input text expression is parsed, tokens are created, not keywords. In order for the Examiner's assertion that Allen's tokens are equivalent to applicants' linguistic component to be correct, Allen's tokens must also be compared to the plurality of tags. The Examiner seems to be asserting that either Allen's keyword identifiers or Allen's triggers are equivalent to applicants' plurality of tags and that links to contacts, calendar events, projects, etc. are equivalent to applicants' corresponding tag actions. (Office Action, page 3.) The Examiner has asserted that Allen provides a plurality of keyword identifiers and triggers having associated linking actions (links to contacts, calendar events, projects, etc.) stored in a keyword definition table and in support of his assertion, cites Figure 12, Elements 852 and 854 of Allen. *Id.* Allen's tokens in Figure 10 are being compared by the Examiner to the triggers of trigger table 856 in Figure 12; yet, the triggers of trigger table 856 do not have a corresponding tag action associated with them as the plurality of tags must, to conform to the recitation of applicants' step (b).

The Examiner has asserted that the corresponding tag action is the linking action, but there is no linking action associated with the trigger in Allen. If a token is asserted as being equivalent to a trigger, it should be noted that the trigger is appended to the contents of the keyword buffer (as taught by Allen at column 12, lines 61-62). However, appending a trigger to the keyword buffer is not equivalent to a linking action. Any linking action in Allen is associated with the keyword dictionary 852 that includes a definition link (Def. Link), which points to the keyword definition entry corresponding to the keyword in the keyword dictionary 852 (Allen, column 12, lines 30-33). There is no comparison between Allen's tokens and the keywords of keyword dictionary 852. Allen discloses that in block 1110 of Figure 11, the current keyword in the current keyword buffer is used to perform a look up for the associated keyword in keyword dictionary 852 (Allen, column 13, lines 25-28.) This step is taken when the current keyword buffer contains the greater number of continuous tokens found in the user input keynote that form a predefined keyword in keyword dictionary 852 (Allen, column 13, lines 22-25.) So, once the tokens of Figure 10 have been processed, the results are keywords, not tokens. Thus, tokens are not being compared with keywords.

Accordingly, for the reasons given above and in the Office Action response of June 21, 2006, the rejection of independent Claim 1 under 35 U.S.C. § 102(b) over Allen should be withdrawn since Allen does not teach or suggest *at least one linguistic component* that is identified by parsing a text entry and that is then compared to the plurality of tags, and does not teach or suggest exhibiting at least one behavior in the document

that is based on at least one of a template and a schema associated with both the tag and the document, respectively.

Claims 2, 5-7, and 13-14 depend from independent Claim 1. Because dependent claims inherently include all of the steps or elements of the independent claim from which the dependent claims ultimately depend, dependent Claims 2, 5-7, and 13-14 are patentable for at least the same reasons discussed above with regard to independent Claim 1. In addition, Claim 15 has been canceled. Accordingly, the rejection of dependent Claims 2, 5-7, and 13-15 under 35 U.S.C. § 102(b) over Allen should be withdrawn.

Claims Rejected under 35 U.S.C. § 103(a)

The Examiner has rejected Claims 3-4 and 10 under 35 U.S.C. § 103(a) as being unpatentable over Allen and further in view of Goldberg et al. (U.S. Patent No. 6,598,046, hereinafter referred to as "Goldberg").

In addition, the Examiner has rejected Claims 8 and 9 under 35 U.S.C. § 103(a) as being unpatentable over Allen and further in view of Budzinski et al. (U.S. Patent No. 5,715,468, hereinafter referred to as "Budzinski").

Claims 11-12, 39-41, and 43 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Allen and further in view of Ho et al. (U.S. Patent No. 5,836,771, hereinafter referred to as "Ho").

Also, the Examiner has rejected Claims 16-18, 20-21, 23-24, 27-30, 32-33, and 35-36 as being unpatentable over Allen and further in view of Kanaegami et al. (U.S. Patent No. 5,297,039, hereinafter referred to as "Kanaegami").

The Examiner has rejected Claims 19 and 31 as being unpatentable over Allen in view of Kanaegami, and further in view of Goldberg.

The Examiner has rejected Claims 22, 25, 34, and 37 as being unpatentable over Allen in view of Kanaegami, and Budzinski.

The Examiner has rejected Claims 26 and 38 as being unpatentable over Allen in view of Kanaegami and further in view of Ho.

The Examiner has rejected Claim 42 as being unpatentable over Allen in view of Ho and further in view of Goldberg.

Claim 44 is rejected as being unpatentable over Goldberg, in view of Carter et al. (U.S. Patent No. 6,108,619, hereinafter referred to as "Carter").

The Examiner has rejected Claim 45 as being unpatentable over Goldberg, in view of Carter and further in view of Fukao et al. (U.S. Patent No. 5,323,311, hereinafter referred to as "Fukao"). Applicants respectfully disagree with these rejections for the reasons noted below.

Patentability of Independent Claim 16

Significant differences exist between the recitation in applicants' Claim 16 and the teachings of Allen because as set forth in the Office Action response dated June 21, 2006, Allen does not teach or suggest that the document is based on at least one member of a group consisting of a template and a schema. Applicants' step (e) recites:

> for an instance that is returned, automatically causing a tag action associated with said instance to be implemented in the document based on at least one member of a group consisting of a template and a schema associated with both the instance and the document

For example, applicants disclose that a user is enabled to open an Expense Report template or schema that is provided with Smart Tags functionality (applicants' specification, page 13, lines 8-9). In contrast, Allen does not teach or suggest that when a user enters a keynote to the user interface, a document will be based on at least one member of a group consisting of a template and a schema associated with both the instance and the document. Allen's Figures 4A and 4B illustrate examples of the components comprising the keynote and shadow region 210 of user interface 200. However, there is no discussion regarding templates or schemas in Allen when a user provides natural language text expressions (i.e., keynotes) that represent notes, thoughts, or action requests which are provided to user interface 200 (Allen, column 5, lines 59-63). Kanaegami does not provide any further disclosure or suggestion to modify Allen that would correct the deficiencies of Allen relative to the recitation of applicants' Claim 16.

Accordingly, the rejection of independent Claim 16 under 35 U.S.C. § 103(a) over Allen and further in view of Kanaegami should be withdrawn, for the reasons given above, since Allen and Kanaegami do not teach or suggest all of the recited steps of independent Claim 16.

Claims 17-27 ultimately depend from independent Claim 16. Because dependent claims inherently include all of the steps or elements of the independent claim from which the dependent claims ultimately depend, dependent Claims 17-27 are patentable for at least the same reasons discussed above with regard to independent Claim 16. Accordingly, the rejection of dependent Claims 17-27 under 35 U.S.C. § 103(a) over the cited art should be withdrawn.

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Patentability of Independent Claim 28

Independent Claim 28 is directed towards a system for automating actions in a document, based upon text entered in the document by a user. Thus, function (d)(v) is similar to step (e) of independent Claim 16. The Examiner has rejected Claim 28 for reasons similar to those given for Claim 16. However, for the same reasons presented above in connection with traversing the rejection of independent Claim 16, independent Claim 28 also distinguishes over the cited art because the cited art does NOT teach or suggest a document based on at least one member of a group consisting of a template and a schema associated with both the instance and the document.

Accordingly, the rejection of independent Claim 28 under 35 U.S.C. § 103(a) over Allen and further in view of Kanaegami should be withdrawn, for the reasons given above, since Allen and Kanaegami, read separately or together, do not disclose or suggest all of the recited steps of independent Claim 28.

Claims 29-38 ultimately depend from independent Claim 28. Because dependent claims inherently include all of the steps or elements of the independent claim from which the dependent claims ultimately depend, dependent Claims 29-38 are patentable for at least the same reasons discussed above with regard to independent Claim 28. Accordingly, the rejection of dependent Claims 29-38 under 35 U.S.C. § 103(a) over the cited art should be withdrawn.

Patentability of Independent Claim 39

Significant differences exist between the recitation in applicants' Claim 39 and the teachings of the cited art because the cited art does not teach or suggest that the document is produced from a template. Applicants' step (b) recites:

> in respect to *a template from which the document is produced*, associating a tag action with each tag that can thus be activated

Applicants specification further explains that:

> The software components that are executed on a client computing device that is employed by the user to make an entry into a productivity application are shown in FIGURE 2. In this figure, a client computer 100 is executing Microsoft Corporation's Excel XP™ Spreadsheet Program 102, which enables the user to open an *Expense Report template* or schema that is provided with Smart Tags functionality in accord with the present invention. Typically, the *Expense Report template* will be obtained from a server (not shown in this figure) to which client computer 100 is connected and with which it is communicating over a network. The network can be an enterprise LAN, WAN, or the Internet, as well as other types of public networks. Client 100 obtains an *Expense Report template 104* from the server computer that *includes an*

XML spreadsheet with fields predefined for the Expense Report, and its associated Smart Tag dictionary. The Smart Tag dictionary is transferred to the client computer with the document template, but is maintained on the server. (Emphasis added, applicants' specification, page 13, lines 5-17.)

For example, as highlighted in the italic font portion above, template 104 is obtained by client 100 and includes an XML spreadsheet with fields predefined for the Expense Report. Thus, applicants illustrate an example of a template (i.e., template 104) from which the document (i.e., Expense Report) is produced.

In contrast, the cited art does not teach or suggest a template from which the document is produced. The Examiner cites column 7, lines 16-44, Figure 12, and Column 12, lines 5-45 of Allen in support of his assertion. However, the column 7 citation is a reference to a description of Figure 4A and 4B that illustrate the components comprising keynote and shadow region 210, Figure 12 illustrates examples of the operation of the keyword parser of keyword and date/time parser 810 and the column 12 citation explains Figure 12, but these citations and the Figure do not discuss templates.

Accordingly, the rejection of independent Claim 39 under 35 U.S.C. § 103(a) over Allen and further in view of Ho should be withdrawn, for the reasons given above, since Allen and Ho do not teach or suggest all of the recited steps of independent Claim 39. Claims 40-43 ultimately depend from independent Claim 39. Because dependent claims inherently include all of the steps or elements of the independent claim from which the dependent claims ultimately depend, dependent Claims 40-43 are patentable for at least the same reasons discussed above with regard to independent Claim 39. Accordingly, the rejection of dependent Claims 40-43 under 35 U.S.C. § 103(a) over the cited art should be withdrawn.

Patentability of Independent Claim 44

Significant differences exist between the recitation in applicants' Claim 44 and the teachings of the cited art because the cited art does not teach or suggest a template on which the document is based and that the tags and tag actions associated with the tags are centrally maintained.

Applicants' step (a) recites:

a memory in which machine instructions and data are stored, said data including a plurality of tags and tag actions associated with the tags in regard *to a template on which the document is based*;

As highlighted in the italicized portion reproduced above in connection with the traversal of the rejection of independent Claim 39, template 104 is obtained by client 100 and includes an XML spreadsheet with fields predefined for the Expense Report. Thus, applicants illustrate an example of a template (i.e., template 104) on which a document (i.e., Expense Report) is based.

In contrast, the cited art does not teach or suggest a template on which a document is based. The Examiner asserts that Goldberg discloses this step and cites column 5, lines 39-56 with respect to the processor and associated memory and column 6, line 53-column 7, line 6 with respect to metadata. However, applicants do not perceive in these citations where it is taught or suggested that there is a template on which the document is based. The Examiner asserts that the equivalent of applicants' recited document is a document of document repository 20 in Goldberg. Templates are discussed by Goldberg, as noted in the following quote:

> In accordance with the first processing step 24 of FIG. 1, the method of FIG. 3 includes receiving selection criteria corresponding to a user scenario, shown in block 64. This may be accomplished by prompting the user to enter the relevant selection criteria, as shown in block 62. In first processor step 24, the user specifies his role and scenario, which includes the task, process and the stage of the process in which the user is engaged. In addition to the role and scenario information, this first step 24 also includes the user providing domain-specific search terms (e.g. keywords) to further constrain the search. This information may be provided in narrative form, phrasing terminology, character strings, or be directly input as values corresponding to selected tags. The invention contemplates that there is a predefined set of user roles and scenarios. With regard to defining scenarios, the system may utilize a *set of templates* which may be useful in developing and classifying domain-specific scenarios. An example of one such *set of templates* is KADS (knowledge acquisition and design structures) which is a structured methodology for the development of knowledge based systems. KADS includes process definitions (e.g. planning, design, configuration) along with each template's associated subprocesses (e.g. abstract, classify, specify, etc.). (Emphasis added, Goldberg, column 8, lines 38-55.)

However, as noted in the italicized portions above, Goldberg's templates are utilized for defining scenarios and are not a template on which any document in Goldberg's document repository 20 is based.

Applicants' step (c)(i) recites:

enabling the tags and tag actions associated with the tags to be centrally maintained;

For example, FIGURE 5 is a functional block diagram showing the relationship between functional components employed on a client and a server in the present invention. Notice tag 318 and action 320 of tag catalog 316 are disposed on the server. Thus, the tags and tag actions are enabled to be centrally maintained on the server.

In contrast, Goldberg does not teach or suggest centrally maintaining tags and tag actions. The Examiner asserts that Goldberg teaches the functionality of applicants' step (c)(i), since Goldberg teaches maintaining tags and metadata at a central data repository. In support of his assertion, the Examiner cites Figure 1, element 20 and column 4, line 56-column 5, line 3, which is reproduced below:

> With reference to FIG. 1 of the drawings, there is provided a system diagram according to the present invention of a user scenario-based navigational and document retrieval system 10. System 10 is adaptable for access by at least one user 12 having access to at least one computer 14 which has a keyboard 16 for entering the search criteria as taught by the present invention and a display monitor 18. System 10 also includes a database or document repository 20 having a plurality of documents stored therein (best shown in FIGS. 2 and 6). As discussed further herein, each document has assigned to it a set of *predetermined tags* and preferably at least one corresponding *predetermined value* for each tag (*defined as metadata 23*). These tags and values define the parameters by which each document is searchable in repository 20. (Emphasis added, Goldberg, column 4, lines 56-column 5, line 3.)

The Examiner has also asserted that Goldberg teaches an action in the form of retrieving and displaying documents related to specific data tags and in support of his assertion he cites column 8, line 22-column 10, line 55. (Office Action, page 4.) In addition, the Examiner notes that since Goldberg teaches an action in the form of displaying documents related to specific data tags and the claimed "action" has not been specifically defined in the claim language, Claim 44 remains rejected. *Id.* However, applicants do not perceive where Goldberg maintains the **action** of displaying documents in repository 20, and Carter does not correct the deficiency. The references therefore fail to teach all recited details of applicants' claim. Accordingly, the rejection of independent Claim 44 under 35 U.S.C. § 103(a) over Goldberg and further in view of Carter should be withdrawn, for the reasons discussed above since Goldberg and Carter do not teach or suggest all of the recitation of independent Claim 44.

Claim 45 ultimately depends from independent Claim 44. Because dependent claims inherently include all of the steps or elements of the independent claim from which the dependent

claims ultimately depend, dependent Claim 45 is patentable for at least the same reasons discussed above with regard to independent Claim 44. Accordingly, the rejection of dependent Claim 45 under 35 U.S.C. § 103(a) over the cited art should be withdrawn.

Patentability of Dependent Claims 3-4, and 8-12

Claims 3-4 and 8-12 ultimately depend from independent Claim 1. Because dependent claims inherently include all of the steps or elements of the independent claim from which the dependent claims ultimately depend, dependent Claims 3-4 and 8-12 are patentable for at least the same reasons discussed above with regard to independent Claim 1. Accordingly, the rejection of dependent Claims 3, 4 and 10; 8 and 9; and 11 and 12 under 35 U.S.C. § 103(a) over the cited art should be withdrawn.

In view of the Remarks set forth above, it will be apparent that the claims in this application define a novel and non-obvious advance over the prior art, and that the application is in condition for allowance and should be passed to issue without further delay. Should any further questions remain, the Examiner is invited to telephone applicants' attorney at the number listed below.

Respectfully submitted,

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